

MEMO ENDORSED

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October 25, 2022

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: UNITED STATES V. ISMAEL JIMINEZ MARTINEZ
Docket No: 19-Cr-00537-VEC-1

Dear Judge Caproni,

Your honor, I am counsel to Mr. Martinez on the above referenced matter. This Court sentenced Mr. Martinez to 14 months in February of 2020. He was released from custody on March 16th of 2021 and is under post-release supervision until March of 2024. Since his release, Mr. Martinez has been nothing short of a model, law-abiding citizen. We write today to ask that he be allowed to travel to the Dominican Republic from November 11, 2022, to November 23, 2022.

He wishes to make this trip to see family members whom he has not seen in several years. Granting this request would allow him to maintain close ties with his family, some of whom are elderly.

My office has discussed this matter with AUSA Ryan Finkle, and he informed us that he will defer to the recommendations of Probation. My office spoke with the Probation Officer handling Mr. Martinez's case, Ms. Yvonne Torres-Diaz, who indicated Mr. Martinez has a solid record of compliance, and consents to his travel, subject to your approval.

Very truly yours,



ALBERTO A. EBANKS

AAE:mh

U.S. PROBATION DEPARTMENT
SOUTHERN DISTRICT OF NEW YORK
TRAVEL REQUEST FORM

NAME:

Ismael Martinez Jimenez

PACTS #:

USPO NAME:

Yvonne Torres

yvonne_torres@nysp.uscourts.gov

ADDRESS:

609 West 191 Street Apt #D NY, NY 10040

PHONE NUMBER:

917-659-8288

EMAIL:

Ismaelmrtzn19@gmail.com

ALTERNATE CONTACT:

Anaberlin Bencosme (Sister) 646-727-6315

I AM REQUESTING PERMISSION TO TRAVEL TO:

LOCATION:

☐ DOMESTIC _____

☒ INTERNATIONAL Dominican Republic

ADDRESS:

☒ RESIDENCE -Rialto Residencia, Apto C-5, Las Esmeralda Santiago

Whose residence is this _____

Relation to you _____ Cousin

☐ HOTEL/RESORT _____

PURPOSE OF TRAVEL

☐EMPLOYMENT

EXPLAIN _____

☒PERSONAL

EXPLAIN __ I Haven't seen my Family

☐EMERGENCY (less than 2 weeks prior notice) _____

DATES OF TRAVEL

DEPARTING 11-11-2022

RETURNING 11-23-2022

MODE OF TRANSPORTATION

☐AUTOMOBILE

Plate # _____

Make _____ Model _____

☒AIRPLANE

JetBlue Airlines

Flight #137

☐BUS

Bus Company _____

☐TRAIN

Train Company _____

☐CRUISE _____

Ports of Call _____

PERSONS TRAVELING WITH

ADDITIONAL INFORMATION

SUBMIT

☐ **APPROVE** ☐ **DENY**

Application GRANTED. No later than five days prior to his departure, Mr. Jimenez Martinez must provide his P.O. with: (1) his return flight information; and (2) the name and contact information for the person with whom he will be staying while in the Dominican Republic.

SO ORDERED.



Date: 10/25/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE



Jared Lauridsen <jared@ebankslawfirm.com>

Ismael Martinez request to travel

5 messages

Jared Lauridsen <jared@ebankslawfirm.com>
To: Ryan.Finkel@usdoj.gov
Cc: Alberto Ebanks <alberto@ebankslawfirm.com>

Thu, Oct 13, 2022 at 1:22 PM

Good afternoon,

I am reaching out on behalf of Alberto Ebanks, attorney for Mr. Martinez. Mr. Martinez wishes to travel to the Dominican Republic to visit extended family, whom Mr. Martinez has not seen since his incarceration, to my knowledge. He has served his custodial sentence and has nearly two years of post-release supervision remaining; to my knowledge has kept in good standing with the Court in all regards.

The dates of travel would be 11/11 to 11/23. Please let us know if you would be amenable to that travel plan, or if there is cause against it.

Thank you for your time and consideration on the matter,
Jared
The Ebanks Law Firm

Finkel, Ryan (USANYS) <Ryan.Finkel@usdoj.gov>
To: Jared Lauridsen <jared@ebankslawfirm.com>
Cc: Alberto Ebanks <alberto@ebankslawfirm.com>

Thu, Oct 13, 2022 at 1:26 PM

Is he not permitted to travel? What is Probation's view? What case number if this? Thanks.

[Quoted text hidden]

Jared Lauridsen <jared@ebankslawfirm.com>
To: "Finkel, Ryan (USANYS)" <Ryan.Finkel@usdoj.gov>
Cc: Alberto Ebanks <alberto@ebankslawfirm.com>

Thu, Oct 13, 2022 at 1:29 PM

He informed me that his former probation officer told him he would need permission for international travel. I am awaiting response from the current probation officer. Case number 19 C. 537 (VEC).

Many thanks
[Quoted text hidden]

Finkel, Ryan (USANYS) <Ryan.Finkel@usdoj.gov>
To: Jared Lauridsen <jared@ebankslawfirm.com>

Thu, Oct 13, 2022 at 1:40 PM

Cc: Alberto Ebanks <alberto@ebankslawfirm.com>

Government defers to probation.

[Quoted text hidden]

Jared Lauridsen <jared@ebankslawfirm.com>
To: "Finkel, Ryan (USANYS)" <Ryan.Finkel@usdoj.gov>
Cc: Alberto Ebanks <alberto@ebankslawfirm.com>

Thu, Oct 13, 2022 at 1:41 PM

Thank you very much

[Quoted text hidden]